

MAIL HANDLING PROCEDURES

R2-10-207 9 (Sub Tab a)

As of October 2001 concern over the safety of mail has increased significantly as a result of anthrax cases reported, and confirmed, that were attributed to mail containing anthrax spores. In the past security measures were put in place and employees were trained on how to recognize suspicious packages and measures to take should they encounter something they perceived as suspicious. Those perceived threats were mostly concern of package bombs or explosives that may be mailed to an agency or person. Unfortunately, events in the recent past have dictated that we must expand our security measures to include the threat of a biological agent, like anthrax, in mail or packages that employees may encounter. The following are procedures that should be considered for implementation at an agency to reduce the potential for employee exposure to a biological agent delivered through the mail system.

	<p>Guidelines and Criteria: Developing a procedure to respond to emergencies involving suspicious letters received through the mail and educating employees in the established handling procedures will assist in reducing potential exposures and minimizing panic associated with these types of situations. Note that a suspicious package received through the mail requires a different response than that of suspicious letters and these procedures are included in the attached Department of Public Safety (DPS) Document, "Letter and Package Bombs". Whenever a suspicious package is encountered, the area must be vacated and assistance from DPS Bomb Squad will be required.</p>
<p>Who should develop this program?</p>	<p>Depending on the size of the agency, one person or a team within the agency should be responsible for coordinating the development of the plan. If a team approach is used consider assigning employees representing facilities maintenance, mail room supervisors and staff, administrative assistant representatives and employees from geographically separated facilities. The agency Loss Prevention Coordinator will usually be the person coordinating the efforts of the plan development and reporting the progress to the agency Loss Prevention Committee who will implement the procedures required.</p>
<p>What is the first step that should be taken when developing this procedure/plan?</p>	<p>After determining who will be responsible for developing the plan the next step should be conducting an assessment of your current procedures for handling mail in your agency. Does the mail come from a centralized internal mail distribution center (mailroom)?</p>

What are some of the recommendations to consider when developing our agency protocol?

Does it come directly from the US Postal Service directly to an office? How is mail distributed to internal offices? These are all critical components in developing a mail handling protocol for an agency.

Centralized Mail Handling Locations

- A central office within an agency should be a consideration to limit the number of employees who process mail. These employees should be trained in the recognition of suspicious mail, trained in the use of personal protective equipment deemed appropriate for the task, and procedures to follow should an incident occur. Centralized mail locations will also assist in ensuring that containment/isolation of a suspicious letter can be accomplished quickly and efficiently.
- Centralized mail locations should be selected from areas within your agency which afford minimal exposure to other employees or members of the general public not involved in the handling procedure. A central office within an agency could serve as the mail handling location. This area should have emergency procedures clearly posted, emergency contact numbers, a door that can be secured, easy access to a sink with running water and soap for washing of hands and, if possible, an isolated air handling system.

Emergency Notifications: Internal procedures must be established to ensure that employees are aware of who is to be notified should they encounter a suspicious letter.

- Initial emergency contact information must be clearly posted and understood by all employees. In some cases dialing 911 will not notify the local emergency services. In these cases employees must be instructed to dial 9-911.
- Secondary emergency notification procedures. Who do employees notify after they call 911.

Procedures to Secure the Area: Procedures must be established to ensure employees receiving a suspicious letter secure the area to prevent others from being exposed and to preserve evidence for investigators. If a letter is received, and it is confirmed to contain anthrax spores or other biological agents, the area will be designated as a crime scene and it is important to safeguard any evidence in the area for investigators.

- Employees should be instructed on procedures to leave the area and to secure the area. Considerations should include instruction on closing off access into the area, shutting down internal air handlers to minimize airborne contamination, etc.

These procedures will vary depending on the location of the mail handling area.

Personal Protective Equipment (PPE): Consideration should be given to provide employees involved in mail handling and screening appropriate PPE to reduce exposure to potential contaminants. The Center for Disease Control (CDC) recommends that personal protective equipment for workers handling mail be selected based upon the exposure risk and the type of disease to be prevented. Their current recommendations for inhalational vs. cutaneous anthrax are as follows:

- Preventing Inhalation Anthrax
 - Respiratory protection may be needed to protect employees hand-sorting and screening mail. These tasks may generate low levels of airborne particles and may present a risk for exposure. To minimize risks of exposure, proper respiratory protection should be used consistent with CDC guidelines. These include a N100 or N95 respirator. **At the current time, the risk for exposure to anthrax is very low in Arizona.** The Arizona Department of Health Services is not currently recommending the use of any PPE for mail handlers.
 - The need for respiratory protection for workers in other areas should be determined by an on-site risk evaluation. If mail is properly processed through a central location the risk of being exposed is dramatically reduced, therefore respiratory protection should not be deemed appropriate for employees who receive mail at their desk.
 - If respirators are deemed appropriate, a respiratory protection program that complies with the provisions of OSHA (29CFR 1910.134) must be in place. This includes medical clearance for wearing a respirator and a respirator fit-test to ensure the respirator fits properly. Without fit-testing, persons unknowingly may have poor face seals, allowing aerosols to leak around the mask and be inhaled. See chapter XXIII- Respiratory Protection for guidance on establishing a respiratory protection program.
- Preventing Cutaneous (skin) Anthrax
 - Protective gloves should be a consideration for employees who handle and screen mail. The CDC recommends powder free nitrile exam gloves. Latex gloves should be avoided because of the risk of developing skin sensitivity or allergy.

Employee Training Once procedures have been established by the agency, affected employees must be trained on the procedures put in place. Employees handling/screening mail must receive detailed training on the procedures being implemented, emergency procedures, and specific training for each item of PPE provided for the task. Other agency employees should be given an overview of the procedures put in place to safeguard against a potential exposure incident as well as procedures they are to follow should they encounter a suspicious letter.

- **Training Requirements for Mail Handlers/Screeners**

Agencies must ensure that once a location has been established for mail handling operations that a Job Hazard Analysis (JHA) is conducted. The analysis should be conducted by the supervisor of the area where the tasks will be performed. The agency Loss Prevention Coordinator should assist in conducting these assessments. Job Hazard Analysis are required under OSHA standard 29CFR 1910 Sub Part I (1910.132 – 139) for all job tasks requiring the use of personal protective equipment. These assessments provide a systematic process for reviewing job tasks to identify potential hazards, steps to reduce the hazards as well as action taken to prevent exposure to the identified hazard (such as requiring the use of a respirator or gloves). Refer to chapter XXII- Personal Protective Equipment for guidance on how to conduct a job hazard analysis. CDC and USPS have developed training programs in a variety of formats which may be used to supplement the agency site specific training. Information on these training formats is available at their respective internet web sites.

ADDITIONAL INFORMATION:

The following internet web sites may be referred to for additional information on terrorism:

Centers for Disease Control Bio-terrorism Web Page

<http://www.bt.cdc.gov/>

Arizona Department of Health Services Bioterrorism Web Page

<http://www.hs.state.az.us/phs/edc/edrp>

Arizona Division of Emergency Management Web Page

<http://www.dem.state.az.us>

Federal Bureau of Investigation

<http://www.fbi.gov>

United States Postal Service

<http://www.usps.gov>

Occupational Safety and Health Administration

<http://www.osha.gov>

ARIZONA DEPARTMENT OF PUBLIC SAFETY GENERAL INFORMATION BULLETIN

Letter and Package Bombs

Letter and package bombs are not a new threat. In the past, these bombs have generally been used for political terrorism; however, terrorists may send them to anyone selected for intimidation.

Since these bombs vary in size, shape and detonation systems, mail clerks and secretaries should be educated to recognize suspicious looking items. Although there are no standard detection methods, the suggestions outlined below are offered to assist in the recognition effort.

A letter, package or other item received should be considered suspicious if:

- the sender's address is unfamiliar;
- it is unexpected;
- the letter weighs two to five ounces;
- the appearance of the package received is inconsistent with the material ordered;
- it bears a foreign postmark or other foreign markings, is air mail or special delivery;
- it bears restrictive markings such as confidential, personal, etc., especially if reception of personal mail is against company policy;
- it displays excessive postage;
- it displays hand written or poorly typed addresses;
- it displays titles but no names, or incorrect titles;
- it contains misspellings of common words;
- the exterior is stained with oil or other discolorations;
- there is no return address;
- the envelope is rigid, lopsided or uneven;
- there are wires or tinfoil protruding;
- there is excessive securing material such as masking tape, string, etc.; or
- there are visual distractions displayed on the exterior.

Suspicious looking letters, packages, or other received items should not be opened. The item should be isolated, the area evacuated, and the police contacted.